## DECLARATION OF AHMED ADEM JAIL # 196161

I, Ahmed Adem, hereby swear an affirm that the foregoing in true and correct:

- 1. My name is Ahmed Adem. I am currently detained at the Butler county jail in Ohio.
- 2. On July 21st ICE came to pick me up from the Lebanon correctional facility where I had been serving a five year sentence. My scheduled release date was July 26, 2020. I was processed at around 1 or 2 p.m. at the ICE HQ processing center and did not have any food all day. The ICE officers said we (me and the other guys being transferred) would be fed when we got to the detention center in Butler. I also asked if I would be able to call my family and tell them about the move. I was told I would be allowed to call when I arrived at the next place.
- 3. When we got to Butler county detention center several hours later I asked the CO's if we would be fed and explained that I was starving and hadn't eaten all day. The CO's processing me were CO Washburn and CO Phillips. They replied "we feed you when we want to". I kept explaining that I was starving and so were the other guys. They were two Mexican guys that didn't speak much English and I felt like I had to speak up for all of us.
- 4. The CO's told me there was no talking about food.
- 5. Then they put rubber gloves on and told me to follow them out to the change room. There were no cameras in there. Then they began to beat me up. Punching me in the face and neck and back. CO Washburn punched me straight in the mouth. They threw me on to the ground. They kicked me on the ground. CO Philips put his knee on my back and neck. I began to cry for help and to say "I can't breathe". Then I was really scared. I began to say Black Lives Matter, Immigrants lives matter. Please stop. "Then a third CO I think a sergeant came in

- and pointed a Taser at me. I just laid there and took the beating. I had no chance to move I was afraid they were going to kill me. I have never been so afraid in all of my life.
- 6. I had a cut on my head, on my lip, a black eye and was bleeding all over.
- 7. After words they pulled me up and did the body cavity search and had me get dressed.
- 8. They had not properly processed me yet so they took my picture to put on my bracelet but they only took half of my face because the other half was bruised and bloody. The arm bracelet that I have is with the same half face picture.
- 9. They took several other pictures. Maybe around four or five but they were pictures for my bracelet. The part of my face you can see where I have some bruising/bump under my eye.
- 10. After the pictures they were taking me towards another cell and I saw there was a forensics person/officer in the hall way named Ms. Cecila White. I called out to her mam I am not safe. There are no cameras. I am not safe. She told me you are fine you are on camera.
- 11. There was a female trustee whose name I did not know. She told me this is what they do and she told me you are going to be ok.
- 12. A nurse came to see me but only through the glass and she just looked me over and said I was good. I asked her to take my picture but she said no you are good. She did not give me any bandages. I asked her to take pictures of my injuries but she refused and just said I was fine.
- 13. The trustee was told to clean up the mess in the changing room. There was blood in there everywhere on the floor.
- 14. Then Phillips told me to come sign my "ticket" because I had assaulted an officer. I
- 15. I was kept in a booking cell until about 9 p.m. I was cold and had chills. I was told I would get a blanket when I was processed. I asked for my one phone call.

- 16. The new CO said "it says here that you had your phone call already".
- 17. I was then taken to F pod.
- 18. The next day a sergeant came to my cell to hear my ticket. It was Sargent Hoffman. He told me he came to give me an opportunity to explain. I told him what happened. He told me he believed me but he had to believe his officers and he sent me to the hole for 30 days. I wasn't allowed to have phone calls or commissary. I wasn't given any medical treatment.
- 19. While I was in the hole my mom figured out where I was and called the Jail. She was able to speak to a female trustee and the trustee told my mom that I had been beaten and that I was in the hole.
- 20. My mom called some Immigration office in Detroit and then called ICE in DC to give a complaint.
- 21. Later after I was out of the hole someone from an ICE office called me and heard my story and told me he would look into it. I never heard back from anyone from ICE about it.
- 22. The next incident On October 20<sup>th</sup> I was awoken in the morning because a nurse wanted to see me in the day room. She checked my temperature and it was normal. I was sent back to my cell. She had also checked my Bunkie Bayong's temperature before mine. I guess he had a fever. About thirty minutes later around 9 or 9 30 a.m. when we were supposed to have our regular time in the day room and be released from our cells we noticed that our door did not open. My Bunkie and I asked what was happening and were told by an officer. "Bad news you guys are going to H pod (we also called it the hole) for isolation due to a covid concern."
- 23. I asked the officer why I needed to pack up and if somebody could explain what was going on. I asked if I could speak to a sergeant. I knew my temperature was normal. In the past they had just kept people in lock down if there was a concern and I wanted to know why we were

- being brought to the hole. I was upset and wanted answers but I was careful to be respectful because I knew how they were at this place.
- 24. At about 10 o'clock about 5 or 6 CO's came in and yelled back your shit right now to me and my Bunkie Bayong. The names of the CO's that I recognized be were A. Roberts, Bartlitt and Blankton and there was a canine officer. They all came in but some stood at the door, almost blocking so no one can really see what is happening.
- 25. Blankton started yelling you've got to pack your fucking shit up. Then he slammed me to the ground and he asked for cuffs and cuffed me and began kicking and punching me. I told him I am not moving I am trying to comply. I told them I was afraid handcuffed me and then continued beating and kicking me. They punched me on my mouth and head and back and neck. I had blood coming out of my mouth... I believe it was Blankton that kicked me on the back of my head and neck... They were cussing and calling us abusive names like goat and monkey. CO A. Roberts kicked me straight in the back and then also straight in the mouth when I was on the ground. A Roberts called me a fucking terrorist and took my prayer rug and tried to flush it in the toilet. I begged him "please man don't do that please don't'. CO Blankton intervened and told A. Roberts not to do that with my rug. A. Roberts yelled again he's a fucking terrorist. And Plankton said to A. Roberts "You need to calm down." "Why?" Roberts Said "I am already going to lose my job". A. Roberts then said "you guys are lucky to be alive. I want to kill you "You're a fucking goat. A fucking monkey. I can't wait to get you to where I can fuck you up. You mother fucking immigrants"
- 26. While I was beaten they were also beating my bunkie Bayong on his bed. They had thrown him down. He was crying and begging not to be beaten. Then they took us out to the day room.

- 27. When were in the day room. The CO's were laughing at Bayong saying that they had fucked him up and he was crying like a baby. I could hear that he was crying.
- 28. A nurse checked us in the day room. I was bleeding on my lip and face. I asked her to take pictures and told her I had been kicked in my neck and head. She looked me over and said "You're fine, you don't need no pictures." I said. "Mamm I need pictures of my injuries. She did not even give me any bandages. There were cameras in the day room. But there are no camera's in cells. There are cameras in the hall ways. My mask was bloodied.
- 29. Then they took both me and Bayong to the hole, or the H block. On our way out of the day room Mr. Blankton asked another CO to write us up for the attack. He was far away and hadn't even seen what happened.
- 30. I had kept my mask because it was bloody and when the lawyer Zachary came I gave it to him.
- 31. As we were walking to the hole A. Roberts said "I can't wait to get to H pod because I am going to fuck you up some more. You are so lucking to be alive."
- 32. When we got to our cell in the hole. A. Roberts and 3 or 4 other guards put me up against a wall and brought Bayong into the cell. I could hear him screaming and sounds of beating and kicking. There were no cameras. When I was brought into the cell he was laying on the ground.
- 33. My bunkie Bayong crying and in pain and he told me that he had lost his tooth.
- 34. No one came and told us more about why we had been moved. I learned that my bunkie Bayong had a high fever and that's why they thought he had covid. No one ever came and tested either of us for covid.

- 35. At around four p.m. that day I called my mom and told her what happened. She was very worried because I could have covid and she was worried that they would hurt me.
- 36. A few hours after we were there they came and took our commissary because of our ticket.
  Our ticket included a charge of threats to personnel because my mom had called and told them she was calling ICE.
- 37. We couldn't have our commissary. It was like \$40 worth of snacks and food.
- 38. On October 21<sup>st</sup> Sargent Turkill came to hear our ticket. He said you guys should ask no questions of the CO's. If they say move, move. He said "I don't know what Pelosi and Obama told you happens here but you're not welcome and let me say you all lucky I wasn't the CO, when I was the CO I'd have broken your fucking collar bones for resisting. I am tired of you all mother fuckers thinking you know shit and can do shit when you can't."

  There was another CO with Turkill when he came to hear the ticket. It was about 8 or 9 p.m.
- 39. We were in the hole for 15 days. I did not communicate with anyone during that time. We did not receive any medical care.
- 40. Currently in my cell it is very cold it seems like the air conditioning is on my Bunkie and I tried to cover up the vent because it was so freezing cold. I complained about it and they said things were fine and then removed the coverings.
- 41. I am scared in this facility. It feels like they can do anything to you and no one will listen to your side of it because they will take you to a place where there are no cameras. I was in prison for nearly five years and during that time I never had any discipline issues.

I declare (or certify, ve	rify, or state) unde	er penalty of perjury that the foregoing is true and
correct. Executed on	7/3/23 Date	
AhmedAdem (Jul 3, 2023 16:18 EDT)	Ahmed Adem	<u></u>